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May 1, 2020

VIA ECF AND FAX (212.805.7942)

The Honorable Judge Alvin K. Hellerstein
United States District Judge for the Southern District of New York
500 Pearl St., Rm. 1050
New York, NY 10007-1312

Re: Cunningham, et al. v. General Motors LLC, et al., Case No. 20-cv-03097-AKH

Dear Judge Hellerstein:

We represent Defendant General Motors LLC ("GM") in the above-captioned matter and write in accordance with Rule 1.D. of Your Honor's Individual Rules and with consent from Plaintiffs' counsel to respectfully request an extension of GM's time to answer, move or otherwise respond to the Complaint from June 29, 2020 to August 28, 2020. This is GM's first request for an extension of its time to respond to the Complaint and the requested extension would not affect any other deadlines in this matter. GM requests this extension in order to provide it with additional time to investigate and respond to the allegations set forth in the Complaint while managing the disruption caused by the coronavirus global pandemic.

Thank you for your consideration.

Respectfully submitted,

Sarah L. Huff

cc: All counsel of record (via ECF)

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